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UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA, )  
 )  
VS. )  
 )  
TONY TEXIERA, )  
Defendant. )

NO. MJ-04-815-MBB  
04-10165-RCL

**MOTION FOR BAIL**

The Defendant, Tony Texiera, moves that this Court grant him bail in accordance with the following conditions:

1. The Defendant is prepared to secure his bond with property in Massachusetts worth \$295,000.00, in which there is \$245,000.00 in equity.
2. The Defendant agrees to wear an electronic monitoring bracelet.
3. The Defendant is prepared to start work upon his release, if allowed, having recently completed an Associates Degree in air conditioning and refrigerator repair at Bay State Community College in Canton, Massachusetts.

In further support, the Defendant states that he has strong family ties in Brockton, Massachusetts, where he was born on January 5, 1981. He has lived there ever since with his parents, Pedro and Domingas Texiera, at 204 Green Street. Mr. Teixiera has five brothers and sisters, ranging in age from twenty-two to thirty-one. In addition, Mr. Teixiera has three nieces and two nephews. Mr. Teixiera has played a direct role in

<sup>1</sup> The Defendant notes that when arraigned in the Brockton District Court on these charges he was granted bail and was able to post it.

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the rearing of two of his nieces, Kira, eight, and Jasmine, nine, both of whom live at the house at 204 Green Street.

Mr. Teixeira's father has been disabled for two years. Before his injury he worked as a machine operator in Raynham, Massachusetts. Mrs. Teixeira, a CNA, or certified nursing assistant, works two jobs, one at the Guardian Center, a nursing home, and the other at the Brockton Hospital. Mr. Teixeira provides invaluable support to his parents, taking responsibility for the work his father is unable to perform, including maintenance and repairs. He recently replaced the sheetrock in the living room.

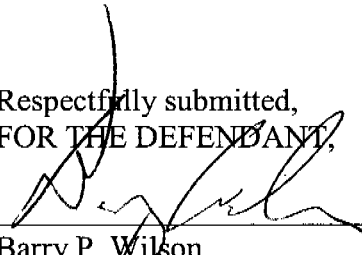
In December of 2003 Mr. Teixeira received an Associates Degree in air-conditioning and refrigerator from Bay State Community College in Canton, Massachusetts. He earlier received a GED. Mr. Teixeira has work awaiting him as an apprentice plumber, and is eager to continue his professional advancement.

Mr. Teixeira is a young man with deep-running roots and family ties in Brockton, Massachusetts. He has lived in Brockton his entire life, and has never traveled far from there. He does not have a passport. As well as that, Mr. Teixeira holds an advanced degree, and is prepared to go to work immediately. Mr. Teixeira has meritorious defenses to the charge against him, and has a great interest in defending his case. He presents no risk of flight and is not a danger to the community.

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For these reasons, and in consideration of the conditions described above, Mr. Teixeira respectfully requests that this Court grant him a reasonable bail. The Defendant requests a hearing on this matter.

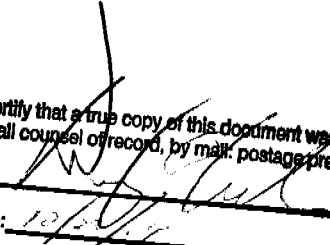
Respectfully submitted,  
FOR THE DEFENDANT,



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Dated: 10/22/04



I certify that a true copy of this document was served  
on all counsel of record, by mail, postage prepaid.

Date: 10/22/04